

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KALEIL ISAZA TUZMAN and
OMAR AMANAT,

Defendants.

S8 15 Cr. 536 (PGG)

DECLARATION OF AVI WEITZMAN

I, AVI WEITZMAN, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct:

1. I am a partner with the law firm of Gibson, Dunn & Crutcher LLP, counsel for Defendant Kaleil Isaza Tuzman. I am a member in good standing of the Bar of this Court. I make this declaration in support of Mr. Isaza Tuzman's Motion to Suppress Contents of the Robin Smyth Laptop or, in the Alternative, for a Continuance in the above-referenced matter.

2. Attached hereto are true and correct copies of the following documents:

<u>Exhibit</u>	<u>Description</u>
A.	A letter that Damian Williams sent to me on July 20, 2016
B.	FBI evidence voucher for Stephen Maiden computers, Bates Number USAO_TUZMAN_0033469
C.	FBI evidence voucher for iPEX dump of iPhone 5 belonging to Stephen Maiden, Bates Number USAO_TUZMAN_0033470
D.	USPIS Invoice for Robin Smyth Apple Mac Laptop, Bates Number USAO_TUZMAN_0033471
E.	A letter-brief from Damian Williams to Hon. Paul G. Gardephe, dated Nov. 17, 2016, in response to Mr. Isaza Tuzman's motion to compel, Dkt. 171

- F. An email chain regarding “Password for thumbdrive,” ending with an email that Andrea Griswold sent to Silvia Serp and others on Jan. 11, 2017
- G. A letter sent by me to Damian Williams on Dec. 5, 2016 requesting discovery
- H. An email chain regarding “Follow up,” ending with an email that Andrea Griswold sent to Silvia Serp and others on Jan. 11, 2017
- I. An email chain regarding “KIT – Missing Recordings,” ending with an email that Andrea Griswold sent to me and others on July 5, 2017
- J. A letter that Damian Williams sent to me and others on Aug. 21, 2017 regarding expert disclosures
- K. A letter sent by me to Damian Williams and others on Aug. 22, 2017
- L. An email chain regarding “United States v. Kaleil Isaza Tuzman, No. S8 15 Cr. 536 (PGG),” ending with an email that Andrea Griswold sent to me and others on Aug. 23, 2017
- M. A chart provided by the government on August 31, 2017 of documents from the Smyth Laptop included on the Government’s Exhibit List
- N. Government’s Exhibit List, dated Sept. 2, 2017
- O. Transcript of the Sept. 6, 2017 hearing in this action
- P. A letter that Damian Williams sent to me and others on July 6, 2017, regarding production of iPex dump for maiden iPhone 5
- Q. Transcript of Hearing, *United States v. Espinal*, No. 10 Cr. 905 (DC) (S.D.N.Y. July 29, 2014), Dkt. 1582

Dated: September 11, 2017
New York, New York

/s/ Avi Weitzman
Avi Weitzman

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2017, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

/s/ Avi Weitzman
Avi Weitzman